

Michael Vertkin
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Pro se: Defendant Michael Vertkin

United States District Court
Northern District of California

Dr. Anna Vertkin,)	Case No.: C 07 4471 SC
)	
Plaintiff,)	
)	
vs.)	Defendant's Initial Disclosures
)	Pursuant to Rule 26
Michael Vertkin, and Does 1-20.)	
)	
Defendants)	

Defendant Michael Vertkin, files initial disclosures required by Fed.Civ.R.P 26(a) at the time of Joint Scheduling Conference or within 14 days thereafter, as required by the rules of the Court.

A. F.R.C.P. 26(a) (1) (A)

Defendant identifies the following persons and legal entities that he believes to have knowledge regarding the matters that are subject of this law suit:

1. Plaintiff, Anna Vertkin
2. Defendant, Michael Vertkin
3. Officer Cully, Mill Valley police Department
4. Officer MaCraken, Mill Valley Police Department
5. Bill MacEwen, family friend and contractor, Dr.Vertkin's former patient

6. Sara Drew, Annals former office assistant
7. Hon. Verna Adams, Marin County Superior Judge
8. Mill Valley Post Office Manager, name unknown at this time
9. Jim Goldberg, Dr. Vertkin's boyfriend
10. Greg Chatten, Forensic Computer Service, Saint Louis, Mo
11. Dr. Vertkin's office manager from May to October of 2006, name unknown at this time.
12. Person or persons who disassemble and vandalized Michael Vertkin's computer, names unknown at this time.
13. Ken Johnson, Dr. Vertkin's personal attorney
14. Agent or representative of American College of Forensic Examiners, Int.
15. Dr. Edwyne Nazarian
16. Person or persons, who reported to Virginia Gilbert Defendant accessing Dr. Vertkin's medical office, names unknown at this time.
17. Agent for E-Trade Financial Services.
18. Agent for Fidelity Investments.

Defendant is in the process of locating and identifying named witnesses and will provide their addresses, phone numbers and other information as they are available. Defendant reserves right to identify and discover other witnesses.

B. F.R.C.P. 26(a) (1) (B)

1. Petition by the Defendant for Marriage Dissolution filed on September 26, 2006
2. TRO filed by the Plaintiff in Marin County Superior Court, dated December 2, 2006
3. Dismissal of TRO with prejudice by the Marin County Superior Court.
4. Petition by the Plaintiff to borrow money against the community property in Marin County Superior Court filed in April of 2006.
5. Denial of the petition to borrow money against community property by Marin County Superior Court.

1 6. Petition for the Protective Order filed by the Plaintiff in Marin County Superior Court.

2 7. Dismissal with prejudice Plaintiff's Petition for Protective Order by Marin County
3 Superior Court.

4 All the above documents are in the possession of the Plaintiff and need not to be provided by
5 the Defendant. Defendant reserves the right to include information and documents related to this
6 case as they become available through furtherer discovery and disclosures. Defendant seeks the
7 financial information from the Fidelity Investments and E-Trade accounts which are not
8 available at this time. Defendant seeks to discover documents and information by which means
9 his personal credit card information and personal bank account statements came into possession
10 of the Plaintiff and her boyfriend.

11 **C. F.R.C.P. 26(a) (1) (C)**

12 At this time Defendant did not file answer to the complaint with the affirmative defenses and
13 contra-claims awaiting District Court ruling on the Motion to Dismiss for Lack of Subject Matter
14 Jurisdiction, Res Judicata and Failure to State the claim on which Court could grant relive.
15 Defendant will calculate the damages after Motion to Dismiss is ruled upon when and if the
16 answer will be filed.

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21 Dated: November 29, 2007

Respectfully submitted,

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23 /s/ Michael Vertkin

24 _____
Michael Vertkin, *pro se*